

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)	
COMMISSION'S TRIENNIAL REVIEW)	
ORDER REGARDING UNBUNDLING)	CASE NO. 2003-00379
REQUIREMENTS FOR INDIVIDUAL)	
NETWORK ELEMENTS)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS AND RESPONSES
TO COMPETITIVE CARRIERS OF THE SOUTH, INC.'S
FIRST SET OF INTERROGATORIES (NOS. 1-24)**

BellSouth Telecommunications, Inc. ("BellSouth"), by and through its undersigned counsel and pursuant to the Commission's Rules and orders, hereby respectfully submits the following Objections and Responses to Competitive Carriers of the South, Inc.'s ("CompSouth's") First Set of Interrogatories dated January 6, 2004.

GENERAL OBJECTIONS

1. BellSouth objects to each and every interrogatory to the extent that such request may call for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.
2. BellSouth objects to each and every interrogatory insofar as the interrogatories are vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories.

Any answers provided by BellSouth in response to these interrogatories will be provided subject to, and without waiver of, the foregoing objection.

3. BellSouth objects to each and every interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth will attempt to note in its responses each instance where this objection applies.

4. BellSouth objects to providing information to the extent that such information is already in the public record before the Commission or that has previously been furnished to CompSouth or its members in this or any similar proceeding in other BellSouth states.

5. BellSouth objects to CompSouth's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Kentucky Civil Practice Act or Kentucky Law.

6. BellSouth objects to each and every interrogatory insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written. BellSouth is a large corporation with employees located in many different locations in Kentucky and in other states. In the course of its business, BellSouth creates countless documents that are not subject to state commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to this. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

7. To the extent that such requests are overly broad and unduly burdensome, BellSouth objects to any discovery request that seeks to obtain “all” of particular documents, items, or information. Any answers provided by BellSouth in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

8. BellSouth objects to the manner in which certain discovery is requested. BellSouth may not maintain information in the ordinary course of its business in the particular format requested by CompSouth. BellSouth objects to providing responsive information in the format requested by CompSouth on the grounds that doing so would be overly broad, unduly burdensome, and oppressive.

9. BellSouth also objects to any request to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC’s Customer Proprietary Network Information (“CPNI”) rules, 47 CFR §64.2007 or under protective agreements with CLECs to which BellSouth is a party. BellSouth will only provide CPNI and CLEC confidential information consistent with the FCC’s rules and BellSouth–executed protective agreements.

SPECIFIC RESPONSES

REQUEST: For each BellSouth wire center in Kentucky, please provide the following information for the wire center in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. The UNE pricing zone;
- b. The Special Access Zone Density Pricing zone;
- c. The MSA the wire center predominately serves;
- d. The LATA;
- e. Identify whether BellSouth enjoys special access pricing flexibility for that wire center.

RESPONSE: a. Information responsive to this request is available at the following URL Link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-11-24/>
The document is titled:
TN_03-00491_BST_Response_to_CompSouth_1st_Inter.zip.
The file name is: TN COMPSOUTH 1ST ROGS FINAL PUBLIC ATTACH 1.

- b. The requested information is publicly available at the following link:
<http://tariff.bst.bls.com/neca/otcodes7.pdf>

The Service Wire Center pricing zone codes for special access services are available under "Listing of Office Type Codes". The applicable codes are as follows:

Codes	Pricing Zone
PA	1
PB	2
PC	3
PD	4

RESPONSE (Cont'd):

The service wire centers are listed with the associated codes in a tabular format in the NECA (FCC#4) tariff for Kentucky. This information is publicly available at the following link:

<http://tariff.bst.bls.com/neca/oct/ky29.pdf>. See the "Service Wire Center V and H Coordinate Information – ky29.vh" section.

- c. Information responsive to this request is available at the following URL Link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-11-24/>
The document is titled:
TN_03-00491_BST_Response_to_CompSouth_1st_Inter.zip.
The file name is: TN COMPSOUTH 1ST ROGS FINAL PUBLIC ATTACH 1.
- d. Information responsive to this request is available at the following URL Link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-11-24/>
The document is titled:
TN_03-00491_BST_Response_to_CompSouth_1st_Inter.zip.
The file name is: TN COMPSOUTH 1ST ROGS FINAL PUBLIC ATTACH 1.
- e. This information is publicly available at the following link:
<http://tariff.bst.bls.com/pdf/fcc/1024.pdf>.

REQUEST: For each BellSouth wire center in Kentucky, please provide the number of loops, by type listed below, provisioned to CLECs in the past 3 months in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. UNE analog loop;
- b. UNE DS-1 loop;
- c. Analog special access;
- d. DS-1 special access;
- e. UNE-P (residential);
- f. UNE-P (business);
- g. Other.
- h. Please provide the statewide total for (a) through (g).

RESPONSE: a.- b. The information responsive to this request is proprietary and is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 2, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.

c.- d. BellSouth is unable to isolate the number of special access circuits provided to CLECs. However, in an attempt to be responsive, BellSouth states that responsive proprietary information is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 2, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.

e.- g. The information responsive to this request is proprietary and is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 2, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.

h. Statewide totals for Kentucky are as follows:

Analog Loop	DSL Loop	DS1 Loop	SPA Analog	SPA DS1	UNE-P RES COMBO	UNE-P BUS COMBO
110	47	94	4	858	35,507	3,803

REQUEST: For each BellSouth wire center in Kentucky, please provide the number of loops, by type listed below, provisioned to CLECs in the past 6 months in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. UNE analog loop;
- b. UNE DS-1 loop;
- c. Analog special access;
- d. DS-1 special access;
- e. UNE-P (residential);
- f. UNE-P (business);
- g. Other.
- h. Please provide the statewide total for (a) through (g).

RESPONSE: a.-b. The information responsive to this request is proprietary and is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 3, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.

c.-d. BellSouth is unable to isolate the number of special access circuits provided to CLECs. However, in an attempt to be responsive, BellSouth states that responsive proprietary information is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 3, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.

e.-g. The information responsive to this request is proprietary and is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 3, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.

h. Statewide totals for Kentucky are as follows:

Analog Loop	DSL Loop	DS1 Loop	SPA Analog	SPA DS1	UNE-P RES COMBO	UNE-P BUS COMBO
183	77	192	42	1,918	70,863	7,771

REQUEST: For each BellSouth wire center in Kentucky, please provide the number of loops, by type listed below, provisioned to CLECs in the past 12 months in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. UNE analog loop;
- b. UNE DS-1 loop;
- c. Analog special access;
- d. DS-1 special access;
- e. UNE-P (residential);
- f. UNE-P (business);
- g. Other.
- h. Please provide the statewide total for (a) through (g).

RESPONSE: a.-b. The information responsive to this request is proprietary and is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 4, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.

c.-d. BellSouth is unable to isolate the number of special access circuits provided to CLECs. However, in an attempt to be responsive, BellSouth states that responsive proprietary information is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 4, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.

e.-g. The information responsive to this request is proprietary and is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 4, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.

h. Statewide totals for Kentucky are as follows:

Analog Loop	DSL Loop	DS1 Loop	SPA Analog	SPA DS1	UNE-P RES COMBO	UNE-P BUS COMBO
337	196	477	63	4,320	94,565	12,638

REQUEST: For each BellSouth wire center in Kentucky, for the most recent quarter for which the information is available, please provide the number of switched access lines in electronic spreadsheet form (i.e., as an Excel Spreadsheet), separately for:

- a. Business analog lines;
- b. Residential analog lines;
- c. Business digital lines (measured in voice grade equivalents);
- d. Please identify the conversion factors used in (c) above.
- e. Please provide the statewide total for (a) through (d).

- RESPONSE:
- a. The information responsive to this request is proprietary and is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 5, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.
 - b. The information responsive to this request is proprietary and is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 5, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.
 - c. BellSouth does not track switched access lines as "analog" or "digital".
 - d. N/A.
 - e. Statewide totals for Kentucky are as follows:

Retail Business	Retail Residence	Total Retail
266,628	721,901	988,529

REQUEST: For each BellSouth wire center in Kentucky, for the most recent quarter for which the information is available, please provide the number of special access lines provided to end-users (i.e., not provided to CLECs) in electronic spreadsheet form (i.e., as an Excel Spreadsheet), separately between:

- a. DS-1 special access lines;
- b. DS-3 special access lines.
- c. Please provide the statewide total for (a) and (b).

RESPONSE: a. The information responsive to this request is proprietary and is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 6, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.

- b. The information responsive to this request is proprietary and is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 6, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.

- c. Statewide totals for Kentucky are as follows:

DS1 SPA	DS3 SPA
10,070	462

REQUEST: Provide the number of EELs in service in Kentucky at the end of the most recent quarter for which such information is available, stated separately for:

- a. EELs comprised of analog loops that are connected to analog transport;
- b. EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport;
- c. EELs comprised of DS-1 loops that are connected to DS-1 transport;
- d. EELs comprised of DS-1 loops that are multiplexed onto DS-3 or higher transport.

RESPONSE: The number of EELs in service in Kentucky at the end of the most recent quarter (3Q03) were:

- a. 7 EELs comprised of analog loops that are connected to analog transport;
- b. 0 EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport;
- c. 754 EELs comprised of DS-1 loops that are connected to DS-1 transport;
- d. 36 EELs comprised of DS-1 loops that are multiplexed onto DS-3 or higher transport.

REQUEST: For the last quarter for which such information is available, provide in electronic spreadsheet form (i.e., as an Excel Spreadsheet) by end-office in Kentucky (by applicable CLLI code) the CLLI of the tandem switch on which the end-office homes;

RESPONSE: Information responsive to this request is available at the following URL
Link: <http://bellsouthcorp.com/policy/triennialreview/filings/2003-11-07/>
The document is titled: GA 17749-U ATT 1 InterPOD.
The file name is GA_17749-U_PUBLIC_INTER_ATTACHMENTS (See Item No. 60a. Attachment).

REQUEST: Provide the number of EEL local connections, in DS-1 equivalents, by BellSouth wire center in Kentucky for each quarter since the fourth quarter of 1999.

RESPONSE: There were no EELs in service from fourth quarter of 1999 until third quarter of 2000.

Information responsive to this request is available at the following URL
Link: <http://bellsouthcorp.com/policy/triennialreview/filings/2003-11-07/>
The document is titled: GA 17749-U ATT 1 InterPOD.
The file name is GA_17749-U_PUBLIC_INTER_ATTACHMENTS (See Item No. 61 Attachment).

REQUEST: With regard to business customers using 24 or fewer analog lines, identify the number of customer locations by the number of switched local service lines in the following table:

Lines	Number of Customer Locations
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	

RESPONSE: The information responsive to this request is proprietary and is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 10, pursuant to the protective agreement in Tennessee Regulatory Authority Docket No. 03-00491.

REQUEST: For the last quarter for which such information is available, provide by end-office in Kentucky (by applicable CLLI code) in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. The CLLI of the tandem switch on which the end-office homes;
- b. The number of shared transport (i.e. transport used in conjunction with unbundled local switching) minutes originating from the end-office;
- c. The number of shared transport minutes terminating to the end-office.

RESPONSE: a. See BellSouth's response to Interrogatory Item No. 8.
b.-c. BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome since BellSouth does not have ready access to shared transport minutes data. To obtain an answer, BellSouth would have to analyze each end office and determine how many UNE-Ps there are in that end office. A percentage would be calculated and applied to all of the trunk groups, assuming that the UNE-P call distribution is homogenous across the BellSouth trunk network in that end office.

To do the work manually would require many hours of time just to download the traffic data. For example, in the Orlando Sand Lake end office, it took 2 hours and 27 minutes to download traffic data for 96 trunk groups for a 7 day period. That example times 13 weeks in a quarter would equal 32 hours of work just for one end office. Since the aforementioned amount of time does not include applying formulas in the spreadsheet to analyze the data for validity and then summing the measurements, BellSouth estimates that time to be comparable to downloading the data.

BellSouth also estimated the cost to have software developed to retrieve the requested data. That cost is estimated to be \$90,000 and would take a month or more to implement.

REQUEST: For the same period as the information provided in the previous question, please provide in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. The total number of interconnection trunks and interconnection minutes at each tandem, separated between:
 - i. Originating trunks and the minutes carried by those trunks;
 - ii. Terminating trunks and the minutes carried by those trunks;
 - iii. Two-ways trunks and the minutes carried by those trunks.
- c. The number of additional trunk terminations available on each tandem;
- d. The number of additional trunk terminations available on each end-office.

RESPONSE: a. See BellSouth's response to Interrogatory No. 11 for details.

b. There is no subpart b. in this request.

c.-d. The information responsive to this request is proprietary and is in CompSouth's possession, custody, or control as it was provided in BellSouth's response to AT&T's First Set of Interrogatories, Item No. 64 pursuant to the protective agreement in Georgia Docket No. U-17749-U.

BellSouth Telecommunications, Inc.
Kentucky Public Service Commission
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REQUEST: There is no Item No. 13 request in this set of interrogatories.

BellSouth Telecommunications, Inc.
Kentucky Public Service Commission
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Item No. 14
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REQUEST: There is no Item No. 14 request in this set of interrogatories.

REQUEST: Provide the number, for the most recent time period for which data is available, of UNE loops served by IDLC and NGDLC arrangements in Kentucky that have been provided to a CLEC:

- a. With unbundled local switching;
- b. Without unbundled local switching.

RESPONSE: Information responsive to this request is available at the following URL Link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-11-07/>
The document is titled GA_17749-U_ATT1_InterPOD.zip.
The file name is GA_17749-U_Public_Inter_Attachments (See Item No. 67 Attachment).

REQUEST: Please state the applicable charges, if any, and the amount of time it takes to transfer a customer's IDLC loop to:

- a. UDLC;
- b. spare copper.

RESPONSE: The existing costs and applicable charges for UNE voice grade or digital loops below DS1 already include work times and activities required to provision the loop on UDLC or copper (assuming facilities are available). The nonrecurring rates for loop provisioning, in each state in the BellSouth region are set forth in BellSouth's interconnection agreements, which are a matter of public record.

REQUEST: During the past 5 years, has BellSouth ever added processor capacity or peripheral equipment to one or more of its local switches due to:

- a. Increased usage;
- b. Exhaust of the number of end-user lines that could be connected to the switch.

RESPONSE: a. Yes. BellSouth has added processor capacity and peripheral equipment due to increased usage in its local switches in the past five years.

b. Yes. BellSouth has added peripheral equipment due to the exhaust of the number of end-user lines that could be connected to its local switches in the past five years.

REQUEST: If the answer to either part of the previous question above is yes, please identify:

- a. The nature of the upgrade performed;
- b. Whether BellSouth had other end-office switches within a 15-mile radius with capacity to handle additional lines;
- c. If the answer to b. is yes, whether BellSouth considered off-loading subscriber lines from the switch requiring the upgrade, and serving those lines from a different local switch. If BellSouth did not consider doing so, why not?

RESPONSE: a. BellSouth's Switch Capacity Management group monitors all usage and capacity limiting items within BellSouth's switch network. The two primary reasons for adding equipment are exhaust of talking channels (usage based exhaust) and exhaust of one of the various types of terminations on the switch. Capacity is added proactively based on usage and/or termination requirements.

Over the past five years there have been substantial processor upgrades, notably the upgrade of the 5ESS processor to the 3B21, the XA-Core processor in some of BellSouth's larger DMS switches and the addition of processor elements as well as the replacement of the older processors in BellSouth's EWSD switches.

Peripheral additions include analog lines, TR-08 terminations, GR-303 terminations, BRI lines, PRIs and trunks. The utilization of each of these components is monitored and additional capacity is added as required. There have been hundreds of capacity additions to BellSouth's switches in the past five years.

RESPONSE (Cont'd):

There are also additional traffic sensitive components that vary by switch type (recorded announcements, metallic testing equipment, memory, etc.). These are monitored by Capacity Management and supplemented based on current utilization and projected requirements.

- b. Given the density of BellSouth's switches, it is likely that there was capacity in switches within a 15-mile radius in some of the projects described in (a) above.
- c. BellSouth did not consider off-loading subscriber lines from the switch requiring capacity to a different local switch. This is not a strategy that has been pursued in managing BellSouth's switch network. The design of BellSouth's network is based on wire center boundaries and there are no mechanisms in place for transporting a large number of lines between switches.

REQUEST: What percentage of the local minutes originating in Kentucky terminate at the same end-office where they originate?

RESPONSE: BellSouth objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive.

REQUEST: For Kentucky wire centers located near the edge of an MSA boundary, please explain the methodology used to assign (or not assign) the wire center to a MSA.

RESPONSE: Each wire center is assigned to MSA in total. No further breakout by NPA/NXX or additional geographic criteria is used.

REQUEST: Provide the number of presubscribed long-distance customers located inside BellSouth's incumbent local exchange areas in Kentucky who have selected BellSouth, BellSouth Long Distance, Inc., or any BellSouth affiliate as their interexchange carrier for either intraLATA or interLATA service. Furnish information for the most for the most recent period for which data is available. Provide totals for intraLATA only, interLATA only, and for customers who selected both service types.

RESPONSE: BellSouth objects to this interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth also objects to this interrogatory to the extent it seeks information not within BellSouth's possession, custody, or control.

REQUEST: Provide the number of presubscribed long-distance customers located in Kentucky but outside BellSouth's incumbent local exchange areas who have selected BellSouth, BellSouth Long Distance, Inc., or any BellSouth affiliate as their interexchange carrier for either intraLATA or interLATA service. Furnish information for the most recent period for which data is available. Provide totals for intraLATA only, interLATA only, and for customers who selected both service types.

RESPONSE: BellSouth objects to this interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth also objects to this interrogatory to the extent it seeks information not within BellSouth's possession, custody, or control.

REQUEST: For the most recent quarter for which the information is available, provide the:

- a. Total number of UNE-P lines in Kentucky;
- b. Total billed revenues for unbundled local switching, shared transport and any charges for call detail records/access records billed UNE-P carriers in Kentucky.

RESPONSE: a. As of September 30, 2003, the number of UNE-P lines in Kentucky was 121,438.

- b. The information responsive to this request is proprietary and is in CompSouth's possession, custody, or control as it was provided in BellSouth's Response to CompSouth's First Set of Interrogatories, Item No. 24, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.

REQUEST: List every end office (by CLLI) in Kentucky currently using the AIN 1.0 Call Model or equivalent to provide a service, feature or function.

RESPONSE: BellSouth interprets this request to mean AIN 0.1 Call Model (rather than AIN 1.0 Call Model). Information responsive to this request is available at the following URL Link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-05/>
The file name format is GA_17749-U_COMPSOUTH1_INTER.PDF (See Item No. 25 Attachment).

Respectfully submitted, this 28th day of January, 2004

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Dorothy J. Chambers", is written over a horizontal line.

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